

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
JANICE M. LAWRENCE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 03-12610-WGY
	)	
AVAYA INC.,	)	
	)	
Defendant.	)	
_____	)	

**JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES**

The plaintiff, Janice M. Lawrence (the "Plaintiff"), and the defendant, Avaya Inc. ("Avaya") (together, the "Parties"), hereby jointly move to enlarge the time to complete discovery and to extend the Scheduling Order deadlines in the above-captioned matter. As grounds for this motion, the Parties respectfully state as follows:

1. The Complaint was filed on December 29, 2004. The defendant filed its Answer on April 13, 2004.
2. According to the original Scheduling Order, discovery is to be completed by November 3, 2004.
3. The Parties have already served and responded to requests for production of documents. The Plaintiff has responded to Avaya's interrogatories; Avaya's response to the Plaintiff's interrogatories is due at the end of October. The only discovery that remains outstanding are depositions.

4. The Parties have made a good-faith attempt to schedule all depositions before the discovery deadline. However, due to unavoidable scheduling conflicts, the Parties will not be able to complete all of the depositions prior to November 3.

5. The Parties, therefore, request an extension of the discovery deadline for one month, until December 3, 2004, and an extension of the summary judgment deadline until January 5, 2005.

6. The Parties do *not* request any extension relative to the pretrial conference or trial dates.

7. The Parties propose the following amended Scheduling Order:

Depositions completed: December 3, 2004

Summary judgment motions under Rule 56 filed: January 5, 2005

Pretrial Conference: No amendment.

Trial: No amendment.

Respectfully submitted,

JANICE M. LAWRENCE

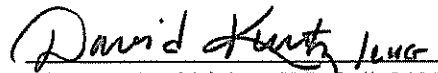
AVAYA INC.

By her attorney,

By its attorneys,



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